

Statement of Michael McClellan, M. D.

State of Ohio)
) ss.
County of Hamilton)

I, Michael McClellan, M.D., after being duly cautioned and sworn state the following on the basis of my own personal knowledge.

1. I am a physician specializing in the practice of internal medicine and am licensed to practice medicine in the State of Ohio. My curriculum vitae is attached.

2. Over the past twelve months I have served as Mr. Eric Jeffries' primary care physician and have seen Mr. Jeffries frequently concerning his difficulties with myalgias, polyarthralgias, abdominal pains, severe headaches, eye problems, rashes, fatigue, lethargy, disorientation, and various other body aches.

3. After seeing Mr. Jeffries many times and spending hours evaluating his symptoms, I am as certain as I can possibly be that Mr. Jeffries' symptoms are real and have a significant debilitating effect on Mr. Jeffries. I believe he is disabled even though specific diagnostic tests have failed to yield a precise diagnosis or common name for his illness. This inability to name Mr. Jeffries' illness is unfortunately not uncommon. In Mr. Jeffries' case, several diseases have been considered including Bechet's disease, porphyria, autoimmune disorders, and paroxysmal nocturnal hemoglobin urea.

4. Mr. Jeffries began to experience these symptoms shortly after receipt of a hepatitis B vaccination and I suspect that Mr. Jeffries suffered some enigmatic autoimmune reaction to the immunization. Vaccinations are known to trigger a person's immune system and tests on Mr. Jeffries do show an elevated level of immune system activity.

5. While it is uncommon to be unable to diagnose autoimmune disorders in general, it is not altogether surprising in this case given that the specific trigger (the Hepatitis B vaccine) would not be expected to evoke other common markers for autoimmune diseases. *Q*

6. It is my opinion that irrespective of the inability to precisely diagnose Mr. Jeffries' condition, the effects of his illness make him unable to perform the material and substantial duties of his occupation of a merchant banker.

Further Affiant Sayeth Naught.




Michael McClellan, M.D.

Notary Public

Before me appeared Michael McClellan, M. D., who after being duly cautioned and sworn, signed his name above.

Notary Public, State of Ohio
My Commission Expires 6-4-2001

Gracia L. Kendrick



10/26/99

CURRICULUM VITAE

MICHAEL M. MCCLELLAN, M.D.
 5553 Wasigo Drive
 Cincinnati, OH 45230-1262
 (513) 232-2656

Business Address: 2727 Madison Road, Suite 208
 Cincinnati, OH 45209
Phone: (513) 321-0833

Date of Birth: [REDACTED]

Social Security Number: [REDACTED]

Family Data: Married (Lynn Powers)
 Four children (David, Katie, Andrew, Kevin)

EDUCATION:

1975 - 1979

Duke University, Durham, North Carolina
 Degree earned: AB
 Honors earned: Graduated Magna Cum Laude

1979 - 1981

Manhattan School of Music, New York, New York
 Degree earned: MM

1984 - 1988

University of Cincinnati College of Medicine
 Cincinnati, Ohio
 Degree earned: MD
 Honors earned: Elected member of Alpha Omega Alpha

POSTGRADUATE MEDICAL EDUCATION:

6/28/88 - 6/27/89

The Christ Hospital, Cincinnati, Ohio
 Internship, Internal Medicine

6/28/89 - 6/27/91

The Christ Hospital, Cincinnati, Ohio
 Residency, Internal Medicine
 A. William Schreiner, M.D., Chairman,
 Department of Internal Medicine
 Corwin R. Dunn, M.D., Program Director

CERTIFICATIONS:

National Board of Medical Examiners
 State Medical Board of Ohio, License #058680, 9/89
 Board certified, Internal Medicine
 (September 1991 exam)

PROFESSIONAL ASSOCIATIONS
AFFILIATIONS:

Member, American College of Physicians

Member, Cincinnati Society of Internal Medicine